

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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December 1, 2020

**Via Electronic Filing**

The Honorable Judge Edgardo Ramos  
U.S. District Court Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Ortiz Ochoa et al v. Prince Deli Grocery Corp. et al*  
**Case No.: 18-cv-09417-ER**

Dear Honorable Judge Ramos:

This law firm represents Defendants Prince Deli Grocery Corp. (d/b/a Prince Deli Grocery) and Abdo S. Anam (a/k/a Abdo Saleh) (together, the “**Defendants**”) in the above-referenced action.

Pursuant to Rule 1(E) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend the fact discovery completion deadline & non-expert deposition completion deadline from December 3, 2020, to through and including, January 18, 2020.

This is the fourth request of its nature. This request is not made on consent of Plaintiff, who did not reply to the undersigned’s meet and conferral attempts. If granted, this request would affect the case management conference currently scheduled for December 9, 2020 at 10:30 a.m. Thus, this application also requests an adjournment of the December 9, 2020 case management conference to a date and time set by the Court after January 18, 2020.

By way of background, the parties have been diligently working with one another to complete discovery. Discovery requests have been issued and promptly responded to. Supplemental requests have been issued and promptly responded to.

The basis of the request is that the undersigned law firm has had difficulty obtaining document and discovery productions from Defendants’ principal, in light of complications caused by the COVID-19 pandemic. Specifically, Defendants’ principal has difficulty providing responsive documents via email, and requires in-person methods of delivering information to the undersigned law firm. The undersigned law firm, until recently, had limited availability to coordinate in-person meetings, and was experiencing mailing issues with USPS deliveries. The undersigned law firm anticipates being in a position to complete non-expert depositions on or before January 18, 2020.

Thus, Defendants respectfully request that: (i) the fact discovery completion deadline & non-expert deposition completion deadline be extended from December 3, 2020, to through and including, January 18, 2020; and (ii) the December 9, 2020 case management conference be adjourned to a date and time set by the Court after January 18, 2020.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel